WESTCAPS
our west valley water coalition

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Jeff Tannler,
Active Management Area Director
Arizona Department of Water Resources
3550 North Central Avenue
Phoenix, AZ 85012

RE: WESTCAPS' CONCERNS REGARDING ENHANCED AQUIFER MANAGEMENT PROCESS

Dear Mr. Tannler:

The West Valley Central Arizona Project Subcontractors (WestCAPS), a group of nine municipal and private water providers with Central Arizona Project (CAP) M&I subcontracts, plus interested parties, supports the basic concept of addressing the disconnect between groundwater pumping and recharge locations in order to reach safe yield. WestCAPS commends the Arizona Department of Water Resources (ADWR) for initiating the discussion of what can be done to provide a set of incentives and disincentives to encourage locating recharge projects near areas of severe water level declines. WestCAPS members have some concerns on topics discussed to date which we wish to bring forward to ADWR.

In the Enhanced Aquifer Management proposal, ADWR suggests larger cuts to the aquifer if stored water is recovered outside of a safe harbor zone (the area one mile around the Underground Storage Facility (USF)), or outside the boundaries of a Groundwater Savings Facility (GSF). WestCAPS recommends that the area of impact around each USF should be defined hydrologically, rather than an arbitrary one mile limit. Areas of hydrological impact may differ due to differing hydrogeological conditions, and it seems best to recognize the differences in such conditions when planning recovery. A flexible approach based on science may yield more effective results. WestCAPS supports science as the basis for planning recharge and recovery.

WestCAPS notes that many providers have large capital investments in current recharge and recovery infrastructure. These facilities were planned to last for many years or decades and provide significant benefits to the organizations which funded their construction. Changes in the way recharge and recovery works should be applied only to new permits for storage facilities so that planning can accommodate revised regulations. As permits expire, some older facilities can gradually be retired, and eventually the shift will be accomplished with a minimum of financial impacts on providers that store and recover water now.

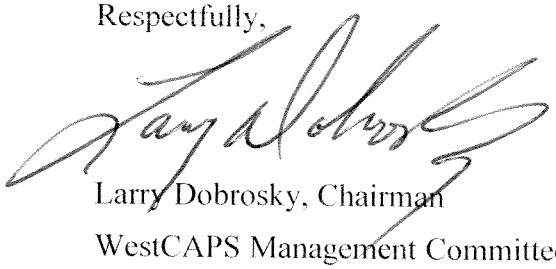
WestCAPS recommends that consideration be given to balancing recharge and recovery within the service areas of water providers. Providers have the greatest interest in sustaining the viability of the aquifer upon which they depend, and should be free to recharge water within their service area without penalizing recovery of that water. Most service areas are geographically limited in size and typically are located within a single groundwater sub-basin into which the area of hydrologic impact for recovery purposes would fit.

However, at least three West Valley cities straddle groundwater sub-basin boundaries as currently understood, potentially with water recharged on one side of the boundary and recovered on the other. These sub-basin boundaries were established decades ago when hydrologic information was less complete. Boundaries may have shifted since, and better information may allow updated definitions of boundaries. It is possible that recovery wells may lie within the service area and the hydrologic area of impact of USFs, as recharge activities overlay the boundaries with a new mound of water, but outside the groundwater sub-basin boundaries as understood decades ago. It does not seem equitable to assign disincentives to recharge activities which would not incur penalties if the area of impact were to be defined hydrologically. WestCAPS recommends close examination of recharge/recovery operations situated on or near sub-basin boundaries to see if the actual benefits desired are accruing to the aquifer, in which case disincentives may not be appropriate. Flexibility would be the best approach to unique cases.

WestCAPS does not support the extension into the future of the concept of recharge in one sub-basin with recovery in another distant sub-basin that has no hydrologic connection. However, WestCAPS notes that recharge of CAP water near recovery wells is not always possible when that water cannot be physically delivered to a city or provider. For this reason, many WestCAPS members have had to recharge CAP water some distance from their recovery wells. This is a matter of necessity rather than choice. WestCAPS will remain engaged in discussions of methods by which recharge and recovery are more spatially related. We look forward to being active participants with ADWR in the development of the Fourth Management Plan, and we applaud the efforts of ADWR to improve the recharge program.

Thank you for this opportunity to offer initial comments.

Respectfully,



Larry Dobrosky, Chairman

WestCAPS Management Committee